

**RECEIVED**  
IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

2007 OCT 11 A 9:49

DEBRA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Michael Ronnie Borsse  
Full name and prison number  
of plaintiff(s)

v.

DAVID Tibbs (Det. for  
D.A.'s office)  
D.T. MARSHALL at Al  
Quality Corrections  
MEDICAL SERVICES

Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

CIVIL ACTION NO. 2:07-cv-914-MHT  
(To be supplied by Clerk of  
U.S. District Court)

**I. PREVIOUS LAWSUITS**

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ( ) NO (☒)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ( ) NO (☒)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

SCANNED

3. Docket number \_\_\_\_\_
4. Name of judge to whom case was assigned \_\_\_\_\_
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit \_\_\_\_\_
7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT The Montgomery County Detention Facility 250 S. McDonough

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED 4000 Lower

Welpumka Rd. Montgomery AL 36110 - Montgomery County Detention Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. DAVID Tibbs (Det) 100 S. LAWRENCE D.A.'s office
2. DET. MARSHALL et al 250 S. McDonough
3. Quality Corrections Health Services 250 S. McDonough
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED JANUARY 28<sup>th</sup> 2007

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Cruel and unusual Punishment; use of excessive force

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

On 01-28-07 David Tibbs Abused his Authority as a Law Enforcement officer by maliciously Assaulting me without provocation - to the point where I had to be treated for numerous injuries

GROUND TWO: Violation of civil rights regarding the Petitioner's arrest

SUPPORTING FACTS: David Tibbs Abused his authority by entering the petitioner's Abode without an Arrest or Search Warrant and without identifying himself as a Police officer

GROUND THREE: Inadequate Medical Treatment, Denial of Proper Medical Treatment

SUPPORTING FACTS: On the night of the Arrest of the Petitioner, I was placed in an isolation cell without an examination by this Medical staff and was treated like an animal/sleeping on a mattress on the floor with no medications or treatment for my injuries for a period of over 2 weeks. In Regards to defendants Quality Correctional Health services, AND D.T. MARSHALL<sup>3</sup> ET AL.

Detention  
Staff

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I would like to receive compensatory  
and punitive damages - 25 million dollars  
and 1.5 million respectively - Also an attorney  
Also I would like an injunction to be treated  
for my head injury  
At a specialist. Michael Boissonneau  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on 10-07-07  
(Date)

Michael Boissonneau  
Signature of plaintiff(s)

